

ON 11-8-18 BRL

Peter A. Moore, Jr., Clerk
US District Court
Eastern District of NCUNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:18-CR-00452-FL(3)

UNITED STATES OF AMERICA)

v.)

INDICTMENT

LEONID ISAAKOVICH TEYF,)
TATYANA ANATOLYEVNA TEYF,)
a/k/a TATIANA TEYF,)
ALEXEY VLADIMIROVICH TIMOFEEV,)

The Grand Jury charges:

INTRODUCTION

1. LEONID ISAAKOVICH TEYF ("TEYF") was born in Belarus, which at the time was a Slavic Republic within the former Soviet Union. Prior to coming to the United States in 2010, he had been a resident of Russia. While in Russia, TEYF served as President of Fishing Group (FG) Delta Plus (hereinafter "FGDP") for approximately five (5) years. Since arriving in the United States, TEYF has been the President of Delta Plus, LLC (hereinafter "Delta Plus"), the United States based subsidiary of FGDP. TEYF is a current legal resident of the United States.

2. TATYANA ANATOLYEVNA TEYF (also known as Tatiana Teyf) ("TATYANA"), is the spouse of LEONID ISAAKOVICH TEYF. She is a citizen of Russia and currently a resident legal alien of the United States.

3. ALEXEY VLADIMIROVICH TIMOFEEV ("TIMOFEEV") is a Russian citizen. He has been in the United States since approximately

October 28, 2014. TIMOFEEV entered the United States pursuant to a B-2 Visa, and currently holds an F-2 visa, derivative to his spouse's F-1 student visa.

4. FGDP is a multinational company headquartered in Volodarskiy, Russia, and was organized on or about April 8, 2002. It reportedly has over fifteen hundred (1,500) employees, eighty (80) fishing vessels, and annual revenue in excess of \$14 Million (USD) and is one of the largest fisheries and fish processing plants in the Volga region of Russia.

5. Delta Plus is a Limited Liability Company organized in the State of North Carolina for the stated primary purpose of operating an urgent care clinic; and is an 80% owned subsidiary of FGDP.

6. CTK Transportation Incorporated (hereinafter "CTK") was incorporated in the State of Illinois, on or about December 27, 2012. According to corporate registration documents, TIMOFEEV is the registered agent of CTK and TEYF is the President of CTK.

7. While Anatoli Serdyokov was Russia's Minister of Defense, Serdyokov granted the company, VOENTORG, a contract to provide the Russian military with goods and services (e.g., laundry, food, and equipment). Voentorg, in turn, subcontracted with various other companies to provide these goods and service.

8. As relevant to this indictment, between 2010 and 2012, exact dates unknown, TEYF was Deputy Director of Voentorg. As

such, TEYF arranged for subcontractors in Russia to fill the various goods and services required of Voentorg's contract with the Russian Ministry of Defense. TEYF and others devised a scheme and artifice that prior to granting a subcontractor the work for Voentorg, the subcontractor had to agree that a certain percentage of the government funds which it would receive for completion of the work would be paid back to TEYF and others involved in that scheme and artifice. These kickbacks of government funds were paid in cash and amounted to more than \$150,000,000 over an approximate two-year span. TEYF and others then directed some of the monies be paid to others involved in the scheme, and some of the monies were placed in various accounts over which TEYF had control. Some of the monies belonging to TEYF were transferred to accounts outside of Russia, and ultimately into accounts located in the United States.

9. Since at least December 2010, TEYF, TATYANA, and others known and unknown to the grand jury have opened at least seventy (70) financial accounts at approximately four (4) domestic financial institutions, in the names of themselves and businesses under their control. TEYF and others received at least 294 wires for an approximate total of \$39,500,000 into four (4) accounts held in TEYF's name and the names of co-conspirators at Bank of America, N.A ("BOA"). Foreign corporations and bank accounts in countries commonly known to be used for money laundering are the

source of 293 of the wires that total approximately \$39,415,000.

10. Account XXXX XXXX 3905 ("BOA 3905") was opened on a date unknown at Bank of America, N.A. Between January 18, 2011 and March 2, 2013, BOA 3905 received \$14,676,107 in wire transfers from accounts in Belize, the British Virgin Islands, Hong Kong, Panama, and Seychelles. Of the accounts from which these funds originated, over \$13,000,000 came from Cyprus, and the remainder from Hong Kong. TEYF is currently a signatory on this account.

11. On September 18, 2012, TEYF opened demand deposit account number XXXX XXXX 9409, (a/k/a LT Revocable Trust "BOA 9409") at Bank of America, N.A. in which TEYF and TATYANA were listed as individual owners and were the only authorized signers on the account. This account received \$4,106,952 in wire transfers between January 2011 and December 2013, the majority of which originated in Cyprus.

12. On a date unknown, account XXXX XXXX 6014 ("BOA 6014") was opened at Bank of America, N.A. As of February 11, 2015, TATYANA was the authorized signer on the account. BOA 6014 received a total of \$17,924,909 in wire transfers, over \$15,000,000 originating in Cyprus, and approximately \$2,000,000 in Hong Kong.

13. In October 2012, account XXX XXXX 1736 was opened by TEYF and TATYANA in the name "New Market Way LLC." This account received \$1,200,000 in transfers from BOA 6014.

14. On a date unknown, account XXXX XXXX 3285 ("BOA 3285") was opened at Bank of America, N.A. Statements from January 2011 reflect the names of both TEYF and TATYANA; as of June 23, 2015, TEYF relinquished all interest in the account and TATYANA remained the sole signatory. Forty-four transfers were made from BOA 3905 into BOA 3285 for approximately \$2,972,000.

15. On a date unknown, account XXXX XXXX 1991 ("BOA 1991") was opened at Bank of America, N.A. Statements from June 2011 reflect the names of both TEYF and TATYANA on the account; in June 2015, TATYANA relinquished all interest in the account and TEYF became the sole signatory. Between August 11, 2011 and March 23, 2012, TEYF made thirteen transfers from BOA 3905 to BOA 1991 for a total of \$10,807,000.

16. On June 22, 2016, TATYANA opened demand savings account number XXXX XXXX 9748 ("BOA 9748") at Bank of America, N.A. in which TATYANA was listed as sole owner and as the only authorized signer on the account. On the same day, \$9,000,000 was transferred from BOA 6014 to BOA 9748.

COUNT ONE

17. The grand jury realleges and incorporates by reference herein all of the allegations contained in paragraphs one (1) through ~~eighteen (18)~~ ^{sixteen (16)} of the Introduction to the Indictment, and further alleges that:

18. Beginning on a date no later than on or about March 2, 2011, and continuing through the present, in the Eastern District of North Carolina and elsewhere, the defendants, LEONID ISAAKOVICH TEYF, TATYANA ANATOLYEVNA TEYF (also known as TATIANA TEYF), ALEXEY VLADIMIROVICH TIMOFEEV, and others known and unknown to the Grand Jury, knowingly combined, conspired and agreed among themselves to commit offenses against the United States in violation of Title 18, United States Code, Section 1957, to wit: by knowingly engaging and attempting to engage in monetary transactions by, through or to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, that is, theft of funds belonging to the government of Russia in the form of kickbacks, a crime in that country, in violation of Title 18, United States Code, Section 1957.

19. All in violation of Title 18, United States Code, Section 1956(h).

COUNTS TWO THROUGH TWENTY-SIX

20. The grand jury realleges and incorporates by reference herein all of the allegations contained in paragraphs one (1) through ~~eighteen (18)~~ ^{sixteen (16)} of the Introduction to the Indictment, and further alleges that:

21. On or about the dates set forth below, in the Eastern District of North Carolina and elsewhere, the defendants, LEONID ISAAKOVICH TEYF, TATYANA ANATOLYEVNA TEYF (also known as TATIANA TEYF), ALEXEY VLADIMIROVICH TIMOFEEV, aiding and abetting each other, did knowingly engage and attempt to engage in the following monetary transactions by through or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is the deposit, withdrawal, transfer, and exchange of U.S. currency, funds, and monetary instruments, such property having been derived from a specified unlawful activity, that is, illegal kickback of funds belonging to the government of Russia.

COUNT	DEFENDANT(S)	ON OR ABOUT DATE	MONETARY TRANSACTION
2	LEONID ISAAKOVICH TEYF, TATYANA ANATOLYEVNA TEYF (also known as Tatiana Teyf), and ALEXEY TIMOFEEV	August 11, 2017	Transfer of \$260,000 from Bank of America Account XXXX XXXX 1736 to Bank of America Account XXXX XXXX 4884
3	LEONID ISAAKOVICH TEYF	November 29, 2016	Check #1075 written on Bank of America Account XXXX XXXX 1736 in the amount of \$21,857.13 and deposited in Bank of America Account XXXX XXXX 4981

COUNT	DEFENDANT(S)	ON OR ABOUT DATE	MONETARY TRANSACTION
4	LEONID ISAAKOVICH TEYF	November 29, 2016	Check #1074 written on Bank of America Account XXXX XXXX 1736 in the amount of \$50,000.00 and deposited in Bank of America Account XXXX XXXX 4981
5	LEONID ISAAKOVICH TEYF and TATYANA ANATOLYEVNA TEYF (also known as Tatiana Teyf)	January 26, 2015	Transfer of \$2,000,000 from Bank of America Account XXXX XXXX 1991 to Bank of America Account XXXX XXXX 6014
6	LEONID ISAAKOVICH TEYF	February 14, 2018	Transfer of \$5,035,006.69 From Bank of America Account XXXX XXXX 1991 to Account XXXX XXXX 3812 at First Citizen's Bank
7	LEONID ISAAKOVICH TEYF	February 14, 2018	Transfer of \$5,035,000.00 from Bank of America Account XXXX XXXX 1991 to Account XXXX XXXX 1502 at BB&T
8	LEONID ISAAKOVICH TEYF	February 14, 2018	Transfer of \$5,035,000.00 from Bank of America Account XXXX XXXX 1991 to Account XXXX XXXX 4726 at PNC bank
9	LEONID ISAAKOVICH TEYF, TATYANA ANATOLYEVNA TEYF (also known as Tatiana Teyf)	October 12, 2016	Payment of real estate taxes in the amount of \$50,662.33 from Bank of America Account XXXX XXXX 3285

COUNT	DEFENDANT(S)	ON OR ABOUT DATE	MONETARY TRANSACTION
10	TATYANA ANATOLYEVNA TEYF (also known as Tatiana Teyf)	January 20, 2015	Transfer of \$200,000 from Bank of America Account XXXX XXXX 3844 to Bank of America Account XXXX XXXX 6014
11	LEONID ISAAKOVICH TEYF and TATYANA ANATOLYEVNA TEYF (also known as Tatiana Teyf)	April 23, 2018	Purchase of a counter check in the amount of \$1,087,804.34 using funds from Bank of America Account XXXX XXXX 3905
12	LEONID ISAAKOVICH TEYF and ALEXEY VLADIMIROVICH TIMOFEEV	May 10, 2018	Transfer of \$30,000 from Bank of America Account XXXX XXXX 3905 to Bank of America Account XXXX XXXX 1314
13	LEONID ISAAKOVICH TEYF and TATYANA ANATOLYEVNA TEYF (also known as Tatiana Teyf)	February 3, 2016	Transfer of \$100,000 from Bank of America Account XXXX XXXX 6014 to Bank of America Account XXXX XXXX 1736
14	TATYANA ANATOLYEVNA TEYF (also known as Tatiana Teyf)	November 2, 2017	Transfer of \$25,000 from Bank of America Account XXXX XXXX 6014 to Bank of America Account XXXX XXXX 7892
15	TATYANA ANATOLYEVNA TEYF (also known as Tatiana Teyf)	June 14, 2016	Transfer of \$300,000 from Bank of America Account XXXX XXXX 6014 to from Bank of America Account XXXX XXXX 3844
16	TATYANA ANATOLYEVNA TEYF (also known as Tatiana Teyf) and ALEXEY VLADIMIROVICH TIMOFEEV	August 30, 2016	Transfer of \$40,000 from Bank of America Account XXXX XXXX 6014 to Bank of America Account XXXX XXXX 1563

COUNT	DEFENDANT(S)	ON OR ABOUT DATE	MONETARY TRANSACTION
17	LEONID ISAAKOVICH TEYF and TATYANA ANATOLYEVNA TEYF (also known as Tatiana Teyf)	February 12, 2015	Transfer of \$450,000 from Bank of America Account XXXX XXXX 6014 to Bank of America Account XXXX XXXX 1736
18	LEONID ISAAKOVICH TEYF and TATYANA ANATOLYEVNA TEYF (also known as Tatiana Teyf)	November 6, 2015	Transfer of \$700,000 from Bank of America Account XXXX XXXX 6014 to Bank of America Account XXXX XXXX 1736
19	LEONID ISAAKOVICH TEYF and TATYANA ANATOLYEVNA TEYF (also known as Tatiana Teyf)	May 29, 2014	Transfer of \$9,000,000 from Bank of America Account XXXX XXXX 6014 to Bank of America Account XXXX XXXX 1991
20	TATYANA ANATOLYEVNA TEYF (also known as Tatiana Teyf)	June 22, 2016	Transfer of \$9,000,000 from Bank of America Account XXXX XXXX 6014 to Bank of America Account XXXX XXXX 9748
21	LEONID ISAAKOVICH TEYF, TATYANA ANATOLYEVNA TEYF (also known as Tatiana Teyf), and ALEXEY VLADIMIROVICH TIMOFEEV	February 19, 2015	Transfer of \$132,000 from Bank of America Account XXXX XXXX 9409 to Wells Fargo Bank Account XXXX XXXX 1952
22	LEONID ISAAKOVICH TEYF, TATYANA ANATOLYEVNA TEYF (also known as Tatiana Teyf) and ALEXEY VLADIMIROVICH TIMOFEEV	November 4, 2014	Transfer of \$19,000 from Bank of America Account XXXX XXXX 9409 to PNC Bank Account XXXX XXXX 5564

COUNT	DEFENDANT(S)	ON OR ABOUT DATE	MONETARY TRANSACTION
23	LEONID ISAAKOVICH TEYF, TATYANA ANATOLYEVNA TEYF (also known as Tatiana Teyf) and ALEXEY VLADIMIROVICH TIMOFEEV	September 25, 2014	Transfer of \$30,000 from Bank of America Account XXXX XXXX 9409 to PNC Bank Account XXXX XXXX 5564
24	LEONID ISAAKOVICH TEYF and TATYANA ANATOLYEVNA TEYF (also known as Tatiana Teyf)	September 2, 2014	Transfer of \$50,000 from Bank of America Account XXXX XXXX 9409 to Bank of America Account XXXX XXXX 0990
25	TATYANA ANATOLYEVNA TEYF (also known as Tatiana Teyf)	April 4, 2018	Transfer of \$1,000,000 from Bank of America Account XXXX XXXX 9748 to First Citizen's Bank Account XXXX XXXX 3951
26	TATYANA ANATOLYEVNA TEYF (also known as Tatiana Teyf)	April 2, 2018	Transfer of \$50,000 from Bank of America Account XXXX XXXX 9748 to First Citizen's Bank Account XXXX XXXX 3951

22. Each entry in the above table constituting a separate violation of Title 18, United States Code, Sections 1957 and 2.

COUNT TWENTY-SEVEN

23. On or about May 23, 2018, in the Eastern District of North Carolina, the defendant, LEONID ISAAKOVICH TEYF, did, directly and indirectly, corruptly give, offer, and promise a thing

of value to a public official, with intent to induce a public official to do an act and omit to do an act in violation of his official duty, that is, by giving \$10,000 to an employee of the United States Department of Homeland Security to cause an individual to be deported from the United States, in violation of Title 18, United States Code, Section 201(b)(1).

COUNT TWENTY-EIGHT

24. On or about June 20, 2018, in the Eastern District of North Carolina and elsewhere, the defendant, LEONID ISAAKOVICH TEYF, did knowingly use or cause another to use a facility of interstate commerce, to wit, a cellular telephone, with intent that the murder of A.G. be committed in violation of the laws of North Carolina as consideration for an agreement to pay things of pecuniary value, to wit: a sum of U.S. currency.

25. All in violation of Title 18, United States Code, Section 1958.

COUNT TWENTY NINE

26. On or about June 20, 2018, in the Eastern District of North Carolina, the defendant, LEONID ISAAKOVICH TEYF, aiding and abetting others known and unknown to the grand jury, knowingly possessed a firearm that had been shipped and transported in interstate commerce from which the manufacturer's serial number had been removed, altered and obliterated, in violation of Title 18, United States Code, Sections 922(k), 924(a)(1)(B) and 2.

FORFEITURE NOTICE

Each named defendant is given notice that all of the defendant's interest in all property specified herein is subject to forfeiture.

Upon conviction of one or more of the offense(s) set forth in Count(s) One through Twenty-Six, the defendant shall forfeit to the United States, pursuant to Title 18 United States Code, Section 982(a)(1), any property, real or personal, involved in such offense(s), or any property traceable to such property.

Upon conviction of one or more of the offense(s) set forth in Count(s) Twenty-Seven and Twenty-Eight, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), as made applicable by Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the said violation(s).

Upon conviction of the offense(s) set forth in Count Twenty-Nine, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), as made applicable by Title 28, United States Code, Section 2461(c), any and all firearms or ammunition involved in or used in a knowing commission of the said offense(s).

The forfeitable property includes, but is not limited to, the following:

- (a) Real property having the physical address of 6510 New Market Way, Raleigh, North Carolina, including all appurtenances and improvements thereto, being legally described in deed book 017100 page 01227 of the Wake County Registry, North Carolina; and any and all proceeds from the sale of said property.
- (b) Real property having the physical address of 7900 Hardwick Drive, Raleigh, North Carolina, including all appurtenances and improvements thereto, being legally described in deed book 017105 page 00839 of the Wake County Registry, North Carolina; and any and all proceeds from the sale of said property.
- (c) A Ruger P94 .40 caliber pistol with obliterated serial number, marked "Sturm, Ruger & Co. Inc. Southport, CONN, U.S.A.";
- (d) All funds held in Bank of America Account No. XXXX XXXX 3905;
- (e) All funds held in Bank of America Account No. XXXX XXXX 6014;
- (f) All funds held in Bank of America Account No. XXXX XXXX 3844;
- (g) All funds held in Bank of America Account No. XXXX XXXX

9409;

(h) All funds held in Bank of America Account No. XXXX XXXX
1314;

(i) All funds held in Bank of America Account No. XXXX XXXX
1991;

(j) All funds held in Bank of America Account No. XXXX XXXX
1736;

(k) All funds held in Bank of America Account No. XXXX XXXX
9748;

(l) All funds held in Bank of America Account No. XXXX XXXX
3285;

(m) All funds held in Bank of America Account No. XXXX XXXX
0990;

(n) All funds held in Bank of America Account XXXX XXXX 4981;

(o) All funds held in Branch Bank and Trust Account No. XXXX
XXXX 1502;

(p) All funds held in First Citizen's Bank Account No. XXXX
XXXX 3812;

(q) All funds held in First Citizen's Bank Account No. XXXX
XXXX 3951;

(r) All funds held in PNC Bank Account No. XXXX XXXX 4726;

(s) All funds held in PNC Bank Account No. XXXX XXXX 5564;

(t) All funds held in Wells Fargo Bank Account No. XXXX XXXX
1952.

If any of the above-described forfeitable property, as a result of any act or omission of a defendant --

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A TRUE BILL

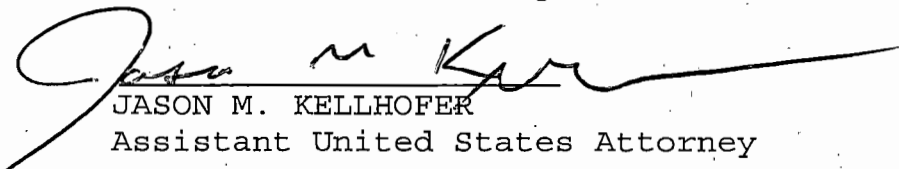
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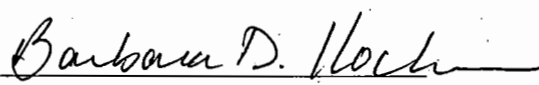
Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOREPERSON

Date: 8 NOV 2018

ROBERT J. HIGDON, JR.
United States Attorney


JASON M. KELLHOFER
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BARBARA D. KOCHER
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